

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

IN THE MATTER OF THE SEIZURE
OF FUNDS UP TO A COMBINED
TOTAL OF [REDACTED] HELD IN A
TRUIST BANK ACCOUNT ENDING
IN [REDACTED] AND A TRUIST BANK
ACCOUNT ENDING IN [REDACTED]

Case No.

23-MJ-196-B

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEIZURE WARRANT**

I, Justin Lowrance, Special Agent with the Federal Bureau of Investigation ("FBI"), being duly sworn, states as follows:

INTRODUCTION

1. I am a Special Agent with the FBI and have been so employed since March 2011. I am currently assigned to the White-Collar Unit within the Mobile Field Office. I have been in this position since April 2021. Prior to that, I was an FBI Special Agent in Oklahoma, an FBI Supervisory Special Agent in South Dakota, and before joining the FBI, a police officer in Indiana beginning in 2005. My current duties include investigating violations of federal law, including financial crimes. I have received training on obtaining and reviewing electronic records, including bank records, and I routinely do so as part of my investigations. As an FBI Special Agent, I am authorized to investigate violations of federal law, and I am authorized to execute seizure warrants issued by federal courts.

2. I make this affidavit in support of an application for a warrant to seize the contents of the following bank account(s):

- a. Truist Bank account number [REDACTED] held in the name of SR Receivables, LLC (hereinafter "**TARGET ACCOUNT 1**"), and Truist Bank account number [REDACTED] (hereinafter "**TARGET ACCOUNT 2**") up to the combined total amount of [REDACTED]

3. Based on the facts set forth in this affidavit, there is probable cause to believe that an unknown individual or individuals committed wire fraud, in violation of Title 18, United States Code, Section 1343. In addition, there is probable cause to believe that funds up to a combined total of [REDACTED] in **TARGET ACCOUNT 1** and **TARGET ACCOUNT 2** constitute and are derived from proceeds traceable to these offenses. Accordingly, these funds are subject to criminal and civil forfeiture for the reasons explained below.

4. This affidavit is submitted for the limited purposed of securing a seizure warrant for the funds identified in Attachment A. Accordingly, I have not set forth all facts known to me concerning this investigation. I have personal knowledge of the information contained in this affidavit based on my direct involvement in this investigation, my discussions with other law enforcement officers who were also directly involved in this investigation, reviews of financial records, and interviews conducted with individuals associated with the wire fraud schemes set out below.

PROPERTY TO BE SEIZED

5. This application is presented in support of a seizure warrant for the following property:

- a. All funds up to a combined total of [REDACTED] held in **TARGET ACCOUNT 1** — *i.e.* Truist Bank account number [REDACTED] held in the name of SR Receivables, LLC — and **TARGET ACCOUNT 2** — *i.e.* Truist Bank account number [REDACTED]

GROUND FOR SEIZURE AND FORFEITURE

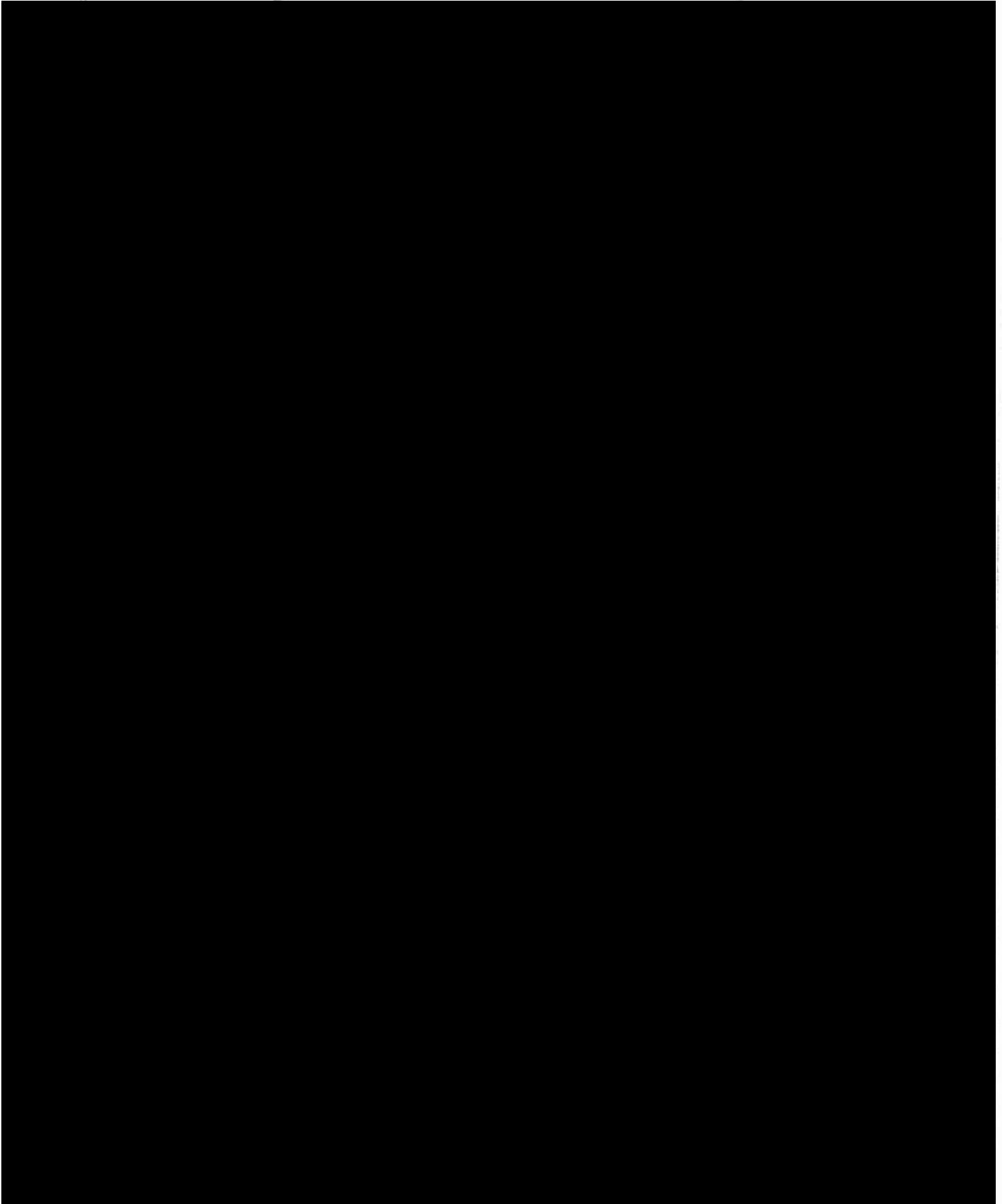
6. The funds in **TARGET ACCOUNTS 1** and **TARGET ACCOUNT 2** are subject to seizure and forfeiture, because they constitute, or are traceable to, proceeds of a wire fraud scheme set out below. Accordingly, these funds are subject to civil forfeiture under 18 U.S.C. § 981(a)(1)(C), and criminal forfeiture under 18 U.S.C. § 981(a)(2)(A) and 28 U.S.C. § 2461.

7. Since these funds are subject to forfeiture, they are also subject to seizure under both the civil seizure statute, 18 U.S.C. § 981(b), as well as the criminal seizure statutes, 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f).

8. Although Truist Bank is headquartered in the Western District of North Carolina, this Court has authority to issue this seizure warrant. *See* 18 U.S.C. § 981(b)(3) (civil authority); 21 U.S.C. § 853(l) (criminal authority).

9. In this case, a restraining order pursuant to 21 U.S.C. § 853(f) would not be sufficient to assure the availability of the proceeds for forfeiture, because there is a substantial risk that the illegal proceeds contained in the accounts will be withdrawn, dissipated, or otherwise made unavailable.

FACTS SUPPORTING SEIZURE WARRANTS



CONCLUSION

21. For all of the reasons stated herein, there is probable cause for this Court to find that the crimes of wire fraud are occurring, and that up to [REDACTED] in **TARGET ACCOUNT 1** and **TARGET ACCOUNT 2** are proceeds of this offense and subject to seizure.

22. Based on the foregoing, I request that the Court issue the proposed seizure warrant pursuant to Federal Rule of Criminal Procedure 41.

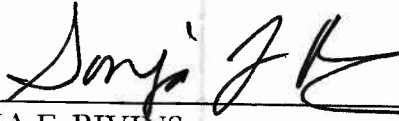
23. Finally, for forfeiture purposes, I request that the seizure warrant explicitly state that the check for the seized amounts be payable to the United States Marshal Service.

Respectfully submitted,



Justin Lowrance
Special Agent
Federal Bureau of Investigation

THE ABOVE AGENT HAS ATTESTED
TO THIS AFFIDAVIT PURSUANT TO
FED. R. CRIM. P. 4.1(b)(2)(A) THIS 15th
DAY OF AUGUST, 2023.



SONJA F. BIVINS
UNITED STATES MAGISTRATE JUDGE



Certified to be a true and
correct copy of the original.
Charles R. Diard, Jr.
U.S. District Court
Southern District of Alabama

By: Shannon Davison
Deputy Clerk

Date: August 15, 2023

ATTACHMENT A

Property to Be Seized

1. The Property to be seized consists of the funds held in Truist Bank Account number [REDACTED], in the name of SR Receivables, LLC, and Truist Bank Account number [REDACTED] up to a combined total of [REDACTED]